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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

| Waymo LLC,

Plaintiff,

V.

20 Uber Technologies, Inc.; Ottomotto LLC; Otto
21 Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF NEEL CHATTERJEE
IN SUPPORT OF OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
SUPPLEMENTAL PROPOSED PRETRIAL
ORDER**

Trial Date: October 10, 2017
Courtroom: 8, 19th Floor
Judge: Hon. William Alsup

Filed/Lodged Concurrently with:

1. Admin. Mtn. to File Document Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Version
4. Proof of Service

1 I, Neel Chatterjee, declare as follows:

2 1. I am a partner at the law firm of Goodwin Procter LLP, counsel of record for
3 Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters
4 within my own personal knowledge and if called as a witness, I could and would competently
5 testify to the matters set forth herein. I make this declaration in support of Defendant Otto
6 Trucking’s Administrative Motion to File Under Seal Portions of Its Supplemental Proposed
7 Pretrial Order (the “Supplemental Proposed Pretrial Order”).

8 2. I have reviewed the following document and confirmed that the portions identified
9 below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Parties
Supplemental Proposed Pretrial Order	Highlighted portions	Waymo (green)

10 3. The above referenced portions of the Supplemental Proposed Pretrial Order
11 highlighted in green contain information that Waymo has designated “Confidential” or “Highly
12 Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking
13 states no position about whether the confidentiality designations are appropriate. Otto Trucking
14 anticipates that Waymo will file any necessary declarations to seal the above information pursuant
15 to Local Rule 79-5.

16 4. Otto Trucking’s request to seal is narrowly tailored to those portions of the
17 Supplemental Proposed Pretrial Order that merit sealing.

18 I declare under penalty of perjury under the laws of the United States that the foregoing is
19 true and correct. Executed this 26th day of September, 2017 in Menlo Park, California.

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/s/ Neel Chatterjee
Neel Chatterjee